



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREETHER
DIRECTOR

November 9, 2018

Ms. Tammy Daniels
The Detroit Land Bank Authority
500 Griswold, Suite 1200
Detroit, Michigan 48226

Mr. Tim Palazzolo
The Detroit Building Authority
1301 Third Street, Suite 328
Detroit, Michigan 48226

Ms. Dolly Saad
MRT Environmental, Inc.
27111 Powers Avenue
Dearborn Heights, Michigan 48125

SRN / ID: U821808159; Wayne County

Dear Ms. Daniels, Mr. Palazzolo and Ms. Saad:

VIOLATION NOTICE

On October 25, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) post-planned renovation inspection at 13103 LaSalle Boulevard, Detroit, Wayne County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

According to our investigation, the Detroit Land Bank Authority and the Detroit Building Authority own the subject facility and MRT Environmental, Inc., is the contractor who performed the planned renovation activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for any violations.

During the inspection, staff observed the following:

Planned renovation activities had taken place on the subject facility. However, asbestos containing material in the form of pipe and fitting insulation remained and was noted both on radiator pipes throughout the facility and on the floor in the basement. The material on the floor was not wetted and was not properly contained.

November 9, 2018

Process Description	Section Violated	Comments
On 10/25/18, staff arrived on site to perform a post-planned renovation inspection. During the inspection staff observed regulated asbestos containing material (RACM) in the form of pipe and fitting insulation throughout the facility.	40 CFR 61.145 (c)(1)	Failure to remove all RACM
	40 CFR 61.145 (c)(4)	Failure to contain RACM in leak-tight containers
	40 CFR 61.145 (c)(6)(i)	Failure to adequately wet

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by November 30, 2018, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations, and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the signed written response to Mr. Craig Dechy at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at Dechyc@michigan.gov and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to us during our phone conversations. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please feel free to contact me at 517-749-2891; dechyc@michigan.gov; or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig Dechy
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Wilhemina McLemore, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Tammy Bell, DEQ